

EXHIBIT A

[Proposed Order]

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

W. R. GRACE & CO., et al.,¹

Reorganized Debtors.

) Chapter 11

) Case No. 01-01139 (KJC)

) (Jointly Administered)

) Related to Docket No. _____

**ORDER SHORTENING NOTICE AND SCHEDULING TELEPHONIC
HEARING ON MOTION BY SGH ENTERPRISES, INC. REQUESTING:
(I) AN EXTENSION OF THE RESPONSE DEADLINE REGARDING
REORGANIZED DEBTORS' THIRTY EIGHTH OMNIBUS OBJECTION TO CLAIM,
AND (II) A CONTINUANCE OF THE HEARING WITH RESPECT THERETO**

Upon consideration of the *Motion by SGH Enterprises, Inc. to Schedule Expedited Telephonic Hearing and Shorten Notice with Respect to Motion by SGH Enterprises, Inc. Requesting: (I) An Extension of the Response Deadline Regarding Reorganized Debtors' Thirty Eighth Omnibus Objection To Claim, and (II) a Continuance of the Hearing With Respect Thereto* (the "Motion to Shorten"), for the entry of an order shortening notice of, and scheduling a hearing on the *Motion by SGH Enterprises, Inc. Requesting: (I) An Extension of the Response Deadline Regarding Reorganized Debtors' Thirty Eighth Omnibus Objection To Claim, and (II) a Continuance of the Hearing With Respect Thereto* (the "Motion to Continue"); and the Court finding that it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, this is a core proceeding pursuant to 28 U.S.C. §157(b), venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409, the relief requested in the Motion to Shorten is in the best interests of

¹ The Reorganized Debtors comprise W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or "Grace") and W. R. Grace & Co.-Conn. ("Grace-Conn."). Grace Energy Corporation was a Reorganized Debtors whose case has been closed.

the Reorganized Debtors, their estates and creditors, proper and adequate notice has been given and no other or further notice is necessary; after due deliberation and sufficient cause appearing therefore, it is hereby:

ORDERED, ADJUDGED AND DECREED THAT:

1. The Motion to Shorten is GRANTED.
2. The Motion to Continue shall be heard on _____, **2015 at _____ (ET).**
3. Any objections to the relief requested in the Motion to Continue must be filed and served on counsel to SGH before the hearing scheduled for on _____, **2015 at _____ (ET).**
4. This Court shall retain jurisdiction over any and all issues arising from or related to the implementation of this Order.

Dated: August ____, 2015
Wilmington, Delaware

THE HONORABLE KEVIN J. CAREY
UNITED STATES BANKRUPTCY JUDGE